

**PHASE I ENVIRONMENTAL  
SITE ASSESSMENT**

Timminco Property  
10380 Smith Road  
Aurora, Colorado

Freedom Project No. 0606-076

Prepared for:

Bruce B. Beaton Real Estate Investments, Inc.  
c/o Liberty Greenfield Corporate Real Estate Advisors  
717 17<sup>th</sup> Street, Suite 2700  
Denver, CO 80202

Prepared by:

***Freedom Environmental Consultants, Inc.***  
12808 West 56<sup>th</sup> Place  
Arvada, Colorado 80002-1330

December 18, 2006

**FREEDOM ENVIRONMENTAL  
CONSULTANTS, INC.**

12808 West 56<sup>th</sup> Place  
Arvada, CO 80002-1330  
Telephone: (303) 940-1410  
Facsimile: (303) 940-1420

December 18, 2006

Mr. Bruce Beaton  
Bruce B. Beaton Real Estate Investments, Inc.  
c/o Liberty Greenfield Corporate Real Estate Advisors  
717 17<sup>th</sup> Street, Suite 2700  
Denver, CO 80202

Subject: Transmittal of Phase I Environmental Site Assessment Report  
Timminco Property  
10380 Smith Road, Aurora, CO  
Freedom Job No.: 0606-076

Dear Mr. Beaton:

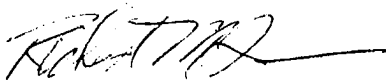
This document is the final report for an Environmental Site Assessment conducted at the referenced site. The study was performed in accordance with Freedom's proposal to Liberty-Greenfield Corporate Real Estate Advisors dated October 24, 2006 and in general accordance with the ASTM Standard E1527-05.

Several common acronyms are used throughout this report. For your convenience, Appendix C lists many common acronyms that may be found in environmental reports.

The information accumulated for this assessment will be retained with your project file. We appreciate the opportunity to perform these Services for you. Please contact me if you have any questions regarding this information.

Sincerely,

**FREEDOM ENVIRONMENTAL CONSULTANTS, INC.**



Richard M. Luce  
President and Principal Geologist  
Environmental Professional

attachment

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**EXECUTIVE SUMMARY  
PHASE I ENVIRONMENTAL SITE ASSESSMENT**

**Timminco Property  
10380 Smith Road  
Aurora, Colorado**

As authorized by Mr. Joseph Havas of Ruby Stein Wagner & Associates on October 27, 2006, Freedom Environmental Consultants performed a Phase I environmental site assessment (ESA) of the above-referenced site (site) in accordance with Freedom's proposal dated October 24, 2006 and in general accordance with the ASTM Standard E1527-05. The following is a summary of findings, conclusions and recommendations, and specific details were not included or fully developed in this section. The report must be read in its entirety for a comprehensive understanding of the items contained in this summary.

Site Description	
Approximate size	9 acres m/l
Property type Occupant(s)	Industrial Timminco Corporation
Nearby roadways	Smith Road adjoins the site to the north and Moline Street adjoins the site to the east.
Access to site	Access to the site is from Moline Street.
Improvements	The site is improved by a large commercial/industrial building (north) of approximately 78,000 square feet and a warehouse building (south) of approximately 36,000 square feet. The balance of the site includes outdoor storage and driveways to the north, east and west of the buildings and landscaped areas to the north.
Activity & Use Limitations (AULs)	None
Surrounding area	The site is located in an area of commercial and industrial businesses.

**Historical Information Summary:** The site acreage was undeveloped land in the 1940s and 1950s, but appeared to have been filled in the 1960s in preparation for development. The current north building was constructed in 1969 and historical information indicated that the south building was constructed in 1972. From the time of construction until about 1999, the site was occupied by Dow Chemical's Magnesium Extrusion fabrication plant. Since that time, Timminco has owned the business and continued the operation. Historical operations included some solvent use, and a subsurface investigation was conducted in 1999 at the time of the business sale. The investigation results indicated that low concentrations of volatile organic compounds were detected in the site soils and groundwater, but no detected concentrations exceeded any State or Federal action levels. Several metals were detected in soils and groundwater, but all were below action levels or were also detected in the upgradient wells suggesting an off-site source. The results of the subsurface investigation did not suggest RECs for the site.

The adjoining properties to the east and west were vacant range land in the 1940s and 1950s. Landfilling operations occurred on both properties prior to their current use. By

the early 1970s, commercial development of the adjoining property to the east had commenced. It continued into the early 1980s and has had a number of tenants since that time. Landfilling continued into the late 1960s or early 1970s on the adjoining property to the west. It was covered and has been undeveloped since that time. The nearest commercial development north of the site began about the same time as the site development and continued to expand through the 1990s. It has been occupied for many years by Frito Lay. The adjoining property to the south was first developed for commercial use by the early 1970s but the historic tenants were not identified in the city directory research. The adjoining historic property uses are not suspected to represent RECs for the site at this time.

**Site Reconnaissance Summary:** The site is improved by two commercial/industrial buildings. Currently, Timminco operates the facility that has been on site since 1969. Timminco has ceased use of much of the solvent that was identified in the 1999 subsurface investigation report. Currently, a limited number of solvents are used at the site for equipment maintenance. One solvent stand is operated and is maintained by Safety Kleen. Hydraulic are used to drive presses. Hydraulic pumps, flow lines, and presses are operated within areas of secondary containment or within closed trench and pit areas to contain any leaks. Acid and caustic baths are present in the south building and are used to clean dyes used in the fabrication operations. Waste acids and caustics as well as used oils are managed by Clean Harbors. Drummed new oil and used oil is stored inside the south building inside a secondary containment. The outdoor storage areas are used to store raw magnesium and aluminum products and miscellaneous items. No hazardous substances or wastes or petroleum products or wastes are stored outside. The current use is not a REC for the site.

**Regulatory Database Summary:** The site was identified as a registered storage tank facility, a Small Quantity Generator (SQG) of hazardous waste and for a spill in 1985. The tank contains propane and is not a REC for the site. The facility was cited in 2002 for a minor infraction related to their hazardous waste management, but they have not been referred to the corrective actions program. Their status as an SQG is not a REC for the site. The spill report indicated that the spilled chemical was PCBs and estimated the spilled volume at 10 to 20 gallons. The report indicated that the impacted medium was soil. Timminco personnel stated that they had no record of the spill in their files (it occurred before Timminco bought the site), and because of the age of the spill, the State and Federal agencies have no additional records. The available records suggested that it was cleaned up although there is no documentation available. Because of the magnitude and the age of the spill, it is not considered a REC for the site. The site was not identified on any other state or federal regulatory databases searched.

Regulated facilities adjoined the site to the east and west. Both are former landfill areas. The adjoining area to the east in the area cross- to upgradient was identified as demolition fill although some historic testing identified at least limited methane generation. In the event of groundwater contamination at that location, the groundwater beneath the subject site may be impacted. The facility to the west was identified for domestic fill, as well as other types of disposal. An investigation in that area suggested groundwater impacts. However, the facility is on the downgradient side of the site and should not pose a REC for the site. Several other regulated facilities were identified in the area generally upgradient but not adjoining the site. However, they did not appear to

represent RECs for the site. The remaining facilities were located in areas cross- to downgradient and are not considered RECs for the site.

***Findings and Conclusions:*** This assessment has revealed no evidence of recognized environmental conditions (RECs) for the site.

With regard to the above-listed Findings and Conclusions, Freedom makes no recommendations for additional assessment at this time.

## 1.0 INTRODUCTION

As authorized by Mr. Joseph Havas of Ruby Stein Wagner & Associates for the benefit of Bruce B. Beaton Real Estate Investments, Inc. (Client) on October 27, 2006, Freedom Environmental Consultants (Freedom) performed a Phase I environmental site assessment (ESA) of the Timminco property at 10380 Smith Road, Aurora, Colorado (site). The location of the site is shown on Figure 1.

### 1.1 Purpose

The purpose of a Phase I Environmental Site Assessment is to aid the Client in the fulfillment of the requirements of the EPA's All Appropriate Inquiry rule issued November 1, 2005. To the extent feasible pursuant to the processes prescribed in ASTM E1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, this ESA identifies "recognized environmental conditions" in connection with the site. As defined in the ASTM, recognized environmental conditions are those that indicate "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into the structures on the property or into the ground, groundwater, or surface water of the property...even under conditions in compliance with laws." RECS do not include *de minimis* conditions that "generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

### 1.2 Scope of Work

These services were performed in accordance with Freedom's proposal dated October 24, 2006 and in general accordance with the ASTM Standard E1527-05. A Phase I ESA has four basic components, including: interviews, review of historical and regulatory database information, general description of the site's physical setting (i.e., geology, topography) and a non-invasive site reconnaissance.

The scope of work for this ESA involves the following tasks:

- Site history review using reasonably ascertainable and readily available records as per ASTM to reveal the site's obvious usage from 1940 or its first developed use, whichever is earlier. This review considered the following information sources for the site and adjoining properties: city directories, aerial photographs, prior ESA reports (if any, provided by Client), fire insurance maps, and land title records (site only, if any, provided by Client). Reasonable attempts were made to interview those with historical details about the site. Historical records review for non-adjoining properties was out-of-scope.
- Review of federal and state environmental database listings compiled by an environmental database search company for the site and facilities within the search radii recommended by ASTM. Identification or confirmation of database listings shown as "unmappable" was out-of-scope. In addition, reasonable attempts were made to contact federal, state and/or local agencies who might be expected to possess information regarding the environmental condition of the site and not readily available through other sources.



- Physical setting information review for the site area derived from the applicable USGS topographic quad and geologic maps, USDA soil surveys, and other readily available sources as may be applicable.
- A non-invasive site reconnaissance to observe accessible and representative portions of the site for RECs. As suggested by ASTM, visual evidence of RECs may include stained soils, stressed vegetation, transformers, evidence of above ground or underground storage tanks, trash and debris, use or storage of hazardous substances or petroleum products. An attempt was made to interview the site contact identified by the Client to learn more about the uses and environmental information for the site. Observations of adjoining properties (from the site's boundaries and public right-of-ways) were made to identify apparent RECs.

This ESA does not include the following: ASTM E-1527-05 Non-Scope Considerations (such as asbestos containing materials, radon, wetlands, lead, regulatory compliance, ecological issues, indoor air quality/fungi, high voltage power lines and other potential issues), detailed review of governmental agency records, review of information or records not received within two (2) days of the final report date, business environmental risk evaluations, or other Services not discussed in this report.

### **1.3 Standard of Care, Use and Limitations**

Freedom services were performed in a manner consistent with industry practices; no warranties, express or implied, are intended or made. Due to the non-invasive, limited and opinion-based nature of a Phase I ESA, Freedom cannot eliminate uncertainty as to environmental conditions at the site nor can we represent that the site contains no hazardous substances, petroleum products or other latent conditions beyond those identified or observed through the Services performed for this ESA. The findings and conclusions in this final report are based upon the site's current use and information sources listed above that are obtained prior to issuance of the final report. Freedom does not warrant the accuracy of information obtained from interviewees or other third parties (e.g., other environmental firms, database or title companies).

Unless otherwise agreed, this ESA was prepared for the exclusive use and reliance of the Client named on the cover of this report and their lender. Third party reliance may be had (if there is no potential conflict of interest between the parties) using a reliance form that is subject to the terms of the proposal for these Services and Freedom's standard Terms and Conditions. The limit of liability specified in those Terms and Conditions constitutes Freedom's aggregate amount of liability to the Client and all relying parties.

The Services herein are in no way to be construed to be or relied upon as a legal interpretation, opinion or advice.

The following ASTM exceptions or deviations apply to these Services (or are described in the scope of work or applicable sections of this report): no exceptions.

## 1.4 User-Provided Information

As partial fulfillment of the ASTM and AAI standards of practice, Freedom provided a User Questionnaire to the Liberty-Greenfield for completion.

The owner representative returned a completed copy of the questionnaire. That questionnaire indicated that land title had not been checked, but they were not aware of any liens. A copy of the information provided is attached in Appendix D.

Other information provided by the Client or their customer through the questionnaire, if any, is discussed in appropriate sections of the report.

## 2.0 GENERAL SITE CHARACTERISTICS

### 2.1 Site Description

The pertinent site features are shown on Figure 2 and described in the following table. Photographs of the site are included in Appendix A. Note that photographic documentation was limited by Timminco to non-production areas.

TABLE 2-1 Site Description	
Approximate size	9 acres m/l
Property type Occupant(s)	Industrial Timminco Corporation
Nearby roadways	Smith Road adjoins the site to the north and Moline Street adjoins the site to the east.
Access to site	Access to the site is from Moline Street.
Improvements	The site is improved by a large commercial/industrial building (north) of approximately 78,000 square feet and a warehouse building (south) of approximately 36,000 square feet. The balance of the site includes outdoor storage and driveways to the north, east and west of the buildings and landscaped areas to the north.
Activity & Use Limitations (AULs)	None
Section, Township, Range	A Portion of the Northwest Quarter of the Northeast Quarter of Section 26, Township 3 South, Range 67 West, 6 <sup>th</sup> Principal Meridian

### 2.2 Adjoining and Surrounding Properties

The surrounding area and adjoining properties are described in the following table:

TABLE 2-2 Adjoining and Surrounding Properties	
General Description Surrounding Properties	The site is located in an area of commercial and industrial businesses.
Adjoining – North	Large industrial properties are north of the site beyond Smith Road and the railroad tracks.

<b>TABLE 2-2 Adjoining and Surrounding Properties</b>	
<b>Adjoining – East</b>	Moline Street adjoins the site to the east, beyond which are two commercial properties at 3576 and 3596 Moline Street.
<b>Adjoining – South</b>	A commercial building occupied by Russell Stover Candies adjoins the site to the south at 3333 Moline Street.
<b>Adjoining - West</b>	A large filled property adjoins the site to the west, beyond which is the Denver County Jail.

### **3.0 PHYSICAL SETTING**

The following information was obtained to provide details as to the site's physical setting. Note that this report may use the terms "up-gradient, cross or side-gradient and down-gradient." These terms refer to the topographic gradient as related to the site which often mirrors actual gradient. Note, however, that groundwater flow direction and the depth to any shallow groundwater likely vary based upon seasonal changes (i.e., precipitation amounts) and the depth to the soil/bedrock interface. Actual groundwater gradient, depth and flow directions cannot be confirmed without information obtained from groundwater monitoring wells installed on site and/or nearby.

#### **3.1 Topography**

The site is located on the Montbello, Colorado 7½-minute USGS topographic quadrangle, prepared in 1965 and revised in 1994. The overall slope of the vicinity is gently down to the southwest toward Sand Creek. The site elevation is approximately 5,300 feet above mean sea level (msl). It is located within the Great Plains physiographic province.

#### **3.2 Soils and Geology**

The soil survey for the site vicinity indicated that it is located within an area of the Ascalon-Vona-Truckton association, described as "Nearly level to strongly sloping, well-drained and somewhat excessively drained, loamy and sandy soils formed in windlaid deposits; on uplands" (USGS – Sampson, 1974). The specific soil unit for the site was the Truckton sandy loam. Underlying the site soils are sediments of the Quaternary eolian deposits beneath which are sediments of the Tertiary-Cretaceous Denver Formation and Lower Part of the Dawson Arkose sediments (Tweto, 1979). Eolian sediments typically consist of fine-grained sandstones, siltstones and shales or claystones deposited in a wind-laid environment. The Denver and Dawson generally consist of shales and claystones with interbedded sandstones and siltstones.

#### **3.3 Groundwater**

The site lies within the Denver Basin principal aquifer system (USGS, 1997). The upper units of the system include the Dawson, Denver, and Arapahoe members, which are typically unconfined or semi-confined water-bearing zones. The stratigraphically lowest member of the aquifer system is the Cretaceous Fox Hills Formation, which is a confined water-bearing unit in much of the Denver metropolitan area.

Shallow groundwater flow typically follows, and can be hypothesized from, the general slope of surface topography, but cannot be confirmed without the benefit of subsurface water level data. Although the topography slopes down to the southwest, a subsurface investigation at the site (described further in Section 4.6) shows the direction of groundwater flow to be toward the northwest.

## **4.0 HISTORICAL RECORDS REVIEW**

This review used reasonably ascertainable and readily available records as per ASTM to reveal the site's obvious usage from 1940 or its first developed use, whichever is earlier. Reasonable attempts were made to interview those with historical details about the site. Historical records review for non-adjointing properties was out-of-scope. The results of this research are discussed below.

### **4.1 Site Ownership**

According to real estate ownership records available on the internet through the Adams County Assessor's Office, the site is owned by Neuropa Limited and others. Freedom personnel spoke with Mr. Scott Churchley of Liberty Greenfield regarding the site ownership (Pc1a, 12/18/06). Mr. Churchley stated that there are several owners of the site property, the majority interest of which is Neuropa, Ltd. He reported that the ownership interests and periods of ownership have varied, but they have owned the site for about the past 30 years. Chain-of-title records were not provided for this assessment. The available ownership information does not suggest a historic use indicative of RECs.

No environmental liens were identified during the title search for the site.

### **4.2 Historical Interviews**

Freedom's contact for Timminco, the current site tenant, was Mr. Shaun Keeling of Timminco. Freedom spoke with Mr. Keeling regarding the site history (Pc2a, 11/3/06). Mr. Keeling stated that Dow Chemical occupied the site from the time it was constructed until the late 1990s. At that time, Timminco acquired the business and continued to operate at the site since that time. To his knowledge, there were no USTs at the site. Additional operational information is included in Section 6 of this report.

A copy of the Record of Communication is included in Appendix D.

A summary of the site history included in a 1999 Phase II Field Investigation indicated that the Dow Chemical Magnesium Extrusion fabrication plant has been on site since its construction in 1969 (north building). The report indicated that the machine shop was constructed in 1972 (south building). It was leased to Otis Elevator from the mid-1970s until 1986 when Dow took it back and converted it to administrative offices and the fabrication building.

The manufacturing activities utilize extrusion technology to form magnesium billets and ingots. Machining of extruded materials is conducted without the use of cutting fluids.

### 4.3 Aerial Photographs

Commercially-available aerial photographs were reviewed at Colorado Aerial Photograph Service in Denver, Colorado, to reveal historical development of the site and adjoining properties. Review of these photos may be limited by a photo's quality and scale. A summary of this review is provided below.

<b>TABLE 4-1 Aerial Photograph Review</b>	
<b>Photo Date Photo No.</b>	<b>Summary of Apparent Features</b>
<b>October 21, 1948 DV-5-038, 039</b>	<b>SITE:</b> The site is open, vacant range land. <b>NORTH:</b> Smith Road and a railroad track adjoin the site to the north. Vacant range land is farther north. <b>EAST:</b> Vacant range land is east of the site. <b>SOUTH:</b> Vacant range land is south of the site with Sand Creek farther south. <b>WEST:</b> A cut bank of an intermittent drainage is west of the site with vacant land farther west.
<b>April 16, 1954 56-91, 92</b>	<b>SITE:</b> NC <b>NORTH:</b> NC <b>EAST:</b> NC although a small residence is to the far east. <b>SOUTH:</b> NC although a small reservoir is to the far south. <b>WEST:</b> NC
<b>March 30, 1964 117-168, 169</b>	<b>SITE:</b> NC although the site may have been filled. The area is being developed. <b>NORTH:</b> NC although just farther north, the land is scarred probably from grading. <b>EAST:</b> A small north-south road is just east of the site. A residential area is to the far southeast. <b>SOUTH:</b> A wastewater treatment plant is just south of the site beyond a small intervening vacant parcel. <b>WEST:</b> Trash or debris is visible west of the site. The land surface is higher than it was.
<b>April 28, 1974 140-403, 404</b>	<b>SITE:</b> The site is improved with the current main building on the northern portion of the site and a second building on the southern portion. Paved parking is north and east of the site with trailer parking and outdoor storage along the south side of the main building. <b>NORTH:</b> Smith Road adjoins the site to the north and a small commercial building is farther north. Vacant land is northeast and northwest from the site. <b>EAST:</b> Moline Street adjoins the site to the east with building pads under construction east of the southeast portion of the site and farther to the southeast. <b>SOUTH:</b> Two commercial buildings are south of the site beyond a narrow intervening parcel. The wastewater treatment plant is farther south. <b>WEST:</b> Additional filling on the adjoining property appears to have taken place.
<b>November 18, 1984 170, 171</b>	<b>SITE:</b> NC although additional development of the area is under way. <b>NORTH:</b> The building to the north has been expanded to the east. Many other commercial/industrial buildings are to the north. <b>EAST:</b> The buildings east of the southeast portion of the site and to the southeast have been completed. A small commercial building is east of the northeast portion of the site. <b>SOUTH:</b> A third building has been constructed to the south. <b>WEST:</b> NC

TABLE 4-1 Aerial Photograph Review	
Photo Date Photo No.	Summary of Apparent Features
July 7, 1995 93, 94	<b>SITE:</b> A small lower elevation structure has been constructed to the south of the southwest corner of the main building. The south building has its current configuration with additions to the west end. <b>NORTH:</b> The building has been expanded to the north. <b>EAST:</b> NC <b>SOUTH:</b> NC <b>WEST:</b> NC although development is farther west.
June 7, 2005 58, 59	<b>SITE:</b> NC <b>NORTH:</b> NC <b>EAST:</b> NC <b>SOUTH:</b> NC <b>WEST:</b> NC

NC = No change from the previous photograph

Of the apparent features summarized above, no site features were observed suggesting a REC for the site. None of the off-site features that were observed suggest a REC for the site. Landfilling was evident to the west in the area downgradient from the site. Apparent filling of the site acreage was reasonably addressed through a subsurface investigation described in Section 4.6, below.

#### 4.4 Fire Insurance Maps

The Sanborn Company prepared maps for use by fire insurance companies since the late 1800s. These maps, which have been updated and expanded geographically on a periodic basis, provide information on the historical use of properties, including the name and business of the building occupants, construction materials, and features, such as aboveground or underground storage tanks. Sanborn Maps are typically published for central business districts and were not available for this site because of its historically rural location.

#### 4.5 City Directories

City directories were reviewed for this project by Satisfi Environmental Information based on information available at the Denver Public Library, Western History Section. The directories searched included the following years: Denver Householder's 1956, Polk's 1960, XL's 1955-56 and 1959, Bresser's 1965-66 and 1970-71, Cole's 1975, 1985, 1995, 1999 and 2004 and US West 1989/90. The site addresses included 11380 Smith Road and 3555 and 3595 Moline Street. Copies of these listings are not provided due to copyright restrictions, but are summarized in the following table.

TABLE 4-2 City Directory Review (possible RECs are in bold print)		
Year	Site Listing	General Description of Adjoining Property Listings
1955-56	NL	NL for any adjoining properties
1959/60	NL	aa
1965-66	NL	Denver County Jail is west of the site.

<b>TABLE 4-2 City Directory Review</b> (possible RECs are in bold print)		
<b>1970-71</b>	11380 Smith Road: Dow	aa
<b>1975</b>	aa	aa
<b>1980</b>	11380 Smith Road: Dow 3555 Moline: Dow	Businesses to the southeast.
<b>1985</b>	aa	Businesses are east and southeast of the site.
<b>1990</b>	3595 Moline: Dow	aa
<b>1995</b>	aa	aa
<b>1999</b>	NL	aa
<b>2004</b>	NL	aa

NL = No Listing

aa = Same as above

Dow Chemical operated the current facility on site since 1969. As described by site personnel (Section 4.2), the operation has remained substantially the same since original construction at the site. On that basis, the site listing is not a REC. Listings for adjoining properties to the east did not suggest the likelihood of RECs for the site from the adjoining properties.

#### **4.6 Additional Sources**

Freedom reviewed a Phase II Field Investigation prepared by URS in 1999. The following is a summary of Freedom's review of that report.

The purpose of the investigation was to evaluate potential site impacts from nearby landfills and historic site operations by Dow Chemical prior to the facility acquisition by Timminco. The scope of work included the drilling of several borings at the site and collection of soil and groundwater samples for laboratory analyses. The groundwater study indicated that the direction of groundwater flow was to the northwest.

Soil samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total recoverable petroleum hydrocarbons (TRPH), and 23 metals (Target Analyte Metals, TAL). Eight VOCs were detected in soil samples collected from depths of three to six feet. None of the detected compounds were found to exceed any regulatory limits or clean up guidelines. No SVOCs were detected. TRPH was detected in press and drum storage areas, but TRPH is not a regulated substance. URS concluded that the detected concentrations were generally below risk-based screening levels or were generally within ranges of background concentrations.

Groundwater samples were analyzed for the same metals and organic compounds as the soil samples. VOCs were detected in six of 11 samples but none exceeded and federal or state groundwater standards. The most prevalent

detected compound appeared to be 1,1,1-trichloroethane (111TCA). It was detected in concentrations ranging from 2.1 to 43 micrograms per liter (µg/L, approximately equal to parts per billion) relative to the groundwater standard of 200 µg/L. The compound was not detected in the groundwater sample collected from the south (upgradient) site boundary. It appeared that the source of the compound was the south building. Based upon the number and distribution of groundwater samples at the site, it appeared that the extent of the compound was reasonably delineated. Because the detected concentrations did not exceed the regulatory limit and the extent appeared reasonably delineated, it is not considered a REC for the site.

No SVOCs or TRPH were detected in the groundwater samples. Antimony, manganese, and selenium were present at concentrations exceeding screening levels, but all were present in upgradient wells indicating that their presence is either related to off-site conditions or is naturally occurring. On the basis of the investigation results, no significant impacts were identified.

Selected sections of the report are included in Appendix D. The included portions of the report include sample location rationale, site history, results and conclusions. On February 9, 1999, the CDPHE issued a letter indicating that they reviewed the Phase II report and concluded that no further action was necessary by Dow Chemical. A copy of that letter is included in Appendix D.

Historic topographic maps of the site and vicinity were researched to identify historic development of the site and vicinity, if any. Maps for the period from 1938 to 1994 were reviewed and the results are summarized below.

TABLE 4-3 Historical Topographic Map Review	
Map Name Date Scale	Summary of Apparent Features
<b>Long Branch</b> <b>1948 (surveyed 1938)</b> <b>7 ½'</b>	<b>SITE:</b> The site is vacant of structures. An intermittent stream crosses or is near the site. <b>NORTH:</b> Vacant land is north of Smith Road and a railroad track. <b>EAST:</b> Vacant land adjoins the site to the east. <b>SOUTH:</b> Vacant land is south of the site to Sand Creek. <b>WEST:</b> Vacant land adjoins the site to the west.
<b>Sable</b> <b>1957</b> <b>7 ½'</b>	<b>SITE:</b> NC <b>NORTH:</b> NC <b>EAST:</b> A trail is to the east beyond intervening vacant land. <b>SOUTH:</b> "Aurora Sewage Disposal" plant is south of the site beyond an intervening vacant parcel. <b>WEST:</b> Denver county line and vacant land are west of the site. The Denver jail is farther west.
<b>Sable</b> <b>1965</b> <b>7 ½'</b>	<b>SITE:</b> NC <b>NORTH:</b> Contours suggest that there has been sand and gravel mining and/or landfilling to the northwest. <b>EAST:</b> NC <b>SOUTH:</b> NC although commercial development is farther southeast. <b>WEST:</b> NC



<b>TABLE 4-3 Historical Topographic Map Review</b>	
<b>Sable</b> <b>1965 photorevised 1971</b> <b>7 ½'</b>	<b>SITE:</b> The north building is on site. <b>NORTH:</b> NC although there are commercial buildings farther north. <b>EAST:</b> NC <b>SOUTH:</b> NC although there is commercial development to the southeast. <b>WEST:</b> NC
<b>Sable</b> <b>1965, photorevised 1979</b> <b>7 ½'</b>	<b>SITE:</b> The south building also is present. <b>NORTH:</b> A building is beyond the railroad and there is additional development in the area. <b>EAST:</b> Buildings are east of the southeast portion of the site and to the southeast. <b>SOUTH:</b> Two buildings are south of the site. <b>WEST:</b> NC
<b>Montbello</b> <b>1965, revised 1994</b> <b>7 ½'</b>	<b>SITE:</b> NC <b>NORTH:</b> The area north is depicted as undifferentiated urban area (UUA) and all details may not be shown. <b>EAST:</b> A building is east of the northeast portion of the site. <b>SOUTH:</b> NC <b>WEST:</b> NC

NC = No change from previous map

No features were observed on site or the adjoining properties that suggested the presence of RECs.

## 5.0 REGULATORY DATABASE REVIEW

Freedom reviewed federal and state environmental database listings compiled by Satisfi Environmental Information (Satisfi) of Greenwood Village, Colorado for the site and facilities within the search radii recommended by ASTM. Identification or confirmation of database listings shown as "unmappable" was out-of-scope. The results of the regulatory database search by Satisfi are included in Appendix B and summarized in the following sections.

To account for the site acreage, a 0.06 mile buffer was established around the center of the site. The standard ASTM search radii were measured from that buffer.

When the following sections refer to "up-gradient, cross or side-gradient and down-gradient," this usage refers only to the topographic gradient which often mirrors actual gradient (actual groundwater gradient, depth and flow directions cannot be confirmed without information obtained from monitoring wells installed on-site and/or nearby).

### 5.1 Site Listings

The site was identified for the following listings:

- Registered Tank – the site was identified as operating a propane tank. This is not a REC for the site.
- RCRA – the site is listed as a Small Quantity Generator (SQG) of hazardous waste. The listing indicated that the facility also was a RCRA Violator. In September 2002, they were cited for land ban requirements and were shown to be in compliance as of December 2002. Because of the nature of the citation,

this listing as a RCRA Violator is not a REC for the site. A further discussion of waste generation at the site is provided in Section 6.2, below.

- **Spill Incident** – the site was identified for a spill of polychlorinated biphenyls (PCBs) in October 1985. Mr. Keeling reported that they researched company files, but no information regarding the spill was identified. The available information in the report suggested that it impacted site soils and may have been cleaned up. Because of the age of the spill, no publicly available files beyond the report were able to be identified. It is likely that the State would have required a clean up of any significant release.

The database search and review of available information indicated that the site is not included in any other federal or state regulatory database listings researched.

## 5.2 Federal Databases

TABLE 5-1 Federal Database Listings for Properties other than the Site		
Database Title and General Description	ASTM Search Radius	No. of Listings
<b>National Priority List:</b> The NPL is the EPA's database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund program. To be included in the NPL, a site must meet or exceed a predetermined hazard ranking system score, be designated as a state top priority site, or meet three specific criteria set jointly by the US Department of Health and Human Services and the EPA in order to become an NPL site.	1.0 mile	0
<b>CERCLIS Database:</b> The CERCLIS List contains sites, which are either proposed to or on the NPL, or are in the screening and assessment phase for possible inclusion on the NPL. The information on each site includes a history of pre-remedial, remedial, and removal and community relations activities or events at the site, financial funding information for the events, and unrestricted enforcement activities. <b>CERCLIS-NFRAP</b> are facilities removed from the CERCLIS database and designated as requiring No Further Remedial Action Planned. These are facilities where completed investigations have indicated that contamination at the site, if any, was not Serious enough to warrant Federal Superfund action or NPL consideration.	0.5 mile	1
	0.25 mile	1
<b>RCRA Databases:</b> Facilities listed in the RCRA databases are designated as hazardous waste treatment, storage, and disposal (TSD) facilities, Corrective Action Sites (CORRACTS), and hazardous waste generators and other hazardous waste (Other HW) activities. Other HW activities may include former generators, identified non-generators or transporters.	CORRACTS = 1.0 Mile	2
	TSD = 0.5 Mile	0
	Generators = 0.25 Mile	5
	Other HW = 0.25 Mile	5
<b>ERNS Database:</b> This database contains information from spill reports of oil or hazardous substances submitted to federal agencies including the EPA, the U.S. Coast Guard, the National Response Center, and the DOT.	0.25 Mile	2
<b>Activity &amp; Use Limitations (AUL):</b> This listing includes Federal and State databases institutional or engineering controls.	0.5 mile	0

### 5.2.1 Discussion of Federal Database Listings

One CERCLIS facility was identified to the southwest in an area cross- to downgradient from and not adjoining the site. The facility reported underwent a private party clean up and based upon its distance and direction from the site, it is not a REC.

One CERCLIS facility was identified for No Further Remedial Action Planned (NFRAP). It is cross- to downgradient and not adjoining the site. It is not a REC.

Two CORRACTS facilities were identified within the search radius. Neither adjoins the site. One facility at 11602 East 33<sup>rd</sup> Avenue is southeast in an area that may be upgradient. At a distance of 500 feet from the site, it is unlikely to significantly affect the groundwater quality beneath the site. The second facility is to the far northwest in an area to downgradient from the site. It is not a REC for the site.

Five facilities are generators of hazardous waste. None of the facilities adjoin the site. Four facilities are in areas cross- to downgradient from the site, and they are not RECs. One facility is to the southeast, the area generally upgradient. However, it is not identified as a RCRA Violator and has not been referred to the corrective action program. Based upon its distance from the site, it is not a REC.

Five facilities are identified as other than generators of hazardous waste. None adjoin the site. Three of the facilities are in areas cross- to downgradient and they are not RECs for the site. Two facilities were to the southeast, the area generally upgradient, but the facilities no longer or never did generate hazardous waste. They are not RECs for the site.

Two spill incidents were identified within the search radius. They were downgradient and not adjoining the site. They are not considered RECs for the site.

### 5.3 State Databases

TABLE 5-2 State Database Listings for Properties other than the Site		
Database Title and General Description	ASTM Search Radius	No. of Listings
<b>Equivalent Priorities Database/Voluntary Clean Up Program:</b> Although the State does not maintain a list of priority clean up sites similar to the NPL, it does track facilities that have been accepted into the Voluntary Clean Up Program.	0.5 mile	1
<b>Solid Waste Disposal Facility Databases:</b> Several State and County databases were reviewed for information regarding solid waste disposal facilities, which are reported and compiled collectively under this database.	0.5 mile	4
<b>Leaking Tanks (includes leaking underground storage tanks, LUSTs, and leaking ASTs) Database:</b> The State tracks the status of facilities where a release of petroleum hydrocarbons from underground and/or above ground storage tanks has been confirmed or reported.	0.5 mile	21

TABLE 5-2 State Database Listings for Properties other than the Site		
Database Title and General Description	ASTM Search Radius	No. of Listings
<b>Registered Tanks (UST/AST) Databases:</b> The State maintains databases of underground and aboveground storage tank (UST/AST) facilities. These databases do not include information on leaking tank facilities.	0.25 mile	10

### 5.3.1 Discussion of State Database Listings

One VCP application was submitted within the search radius. The facility was not adjoining the site and was to the southwest, an area generally cross-gradient. It is not a REC for the site.

Four solid waste facilities were identified within the search radius. Two facilities adjoin the site, one to the east and one to the west. Available information indicated that the facility adjoining the site to the east was a demolition landfill although it appeared that some methane was present in the past. The report indicated that no methane was present in October 1983. This landfill is cross- to upgradient from the site. In the event that the groundwater at the facility has been impacted, it is possible that groundwater beneath the site could be contaminated. The adjoining property to the west was identified as receiving "domestic refuse, construction debris, liquids, hazardous waste, and industrial waste. However, this fill area is downgradient and any impacts from that facility on the subject site would be expected to be limited. The available information indicates that groundwater monitoring wells and soil samples have been collected from the area and have demonstrated soil and groundwater impacts. Groundwater impacts included volatile organic compounds (VOCs), arsenic and lead. As described in Section 4.6, above, a groundwater study at the subject site identified low concentrations of VOCs and some metals, but no significant impacts were identified. The remaining two facilities are not adjoining the site and are in an area generally upgradient at a distance of about 0.4 mile. Based upon their distance from the site, they are not RECs for the site.

Twenty-one (21) leaking tank facilities were identified within the search radius. None of the identified facilities adjoin the site. Thirteen of the facilities are located in areas cross- to downgradient, and they are not RECs for the site. Eight facilities were identified to the southeast in the area generally upgradient. Of those, all have been approved for regulatory case closure. They are not RECs for the site.

Ten registered tank facilities were identified within the search radius. None of the facilities adjoin the site. Six facilities were identified in areas cross- to downgradient and they are not RECs for the site. Four facilities were to the southeast in the area generally upgradient. All have been removed and they are not RECs for the site.

## 5.4 Agency Interviews

Freedom contacted Mr. Brian Hlavacek of Tri-County Health Department regarding any records of environmental incidents at the site (Pc3a, 11/20/06). According to Mr. Hlavacek, the only information identified was a No Further Action Letter from the State regarding the Phase II conducted in 1999 and summarized in Section 4.6. A copy of that letter is included in Appendix D.

Freedom contacted the Aurora Fire Department concerning environmental responses to the site. The department did not respond Freedom's inquiry (Pc4a, 11/20/06).

## **5.5 Supplemental Searches**

Freedom personnel also searched available information regarding the presence of oil and gas wells and/or production on or adjoining the site. Freedom consulted the Colorado Oil & Gas Conservation Commission's online GIS system available through the State's internet web site. The search indicated that no wells are present within one mile of the site.

Freedom also reviewed the State's database for the presence of mines in the site vicinity. In spite of the known sand and gravel mining, the nearest mine was more than one mile to the west.

## **6.0 SITE RECONNAISSANCE**

A non-invasive site reconnaissance was conducted to observe accessible and representative portions of the site for RECs. As suggested by ASTM, visual evidence of RECs considered included stained soils, stressed vegetation, transformers, evidence of above ground or underground storage tanks, trash and debris, use or storage of hazardous substances or petroleum products.

### **6.1 Site Overview**

On November 3, 2006, Mr. Rick Luce, Environmental Professional, conducted the site reconnaissance for this assessment. Mr. Luce was accompanied during the assessment by Mr. Shaun Keeling, Timminco Corporation's safety manager. He reported that he has been at the plant for 21 years.

The site was observed to be comprised of two buildings, one on the northern portion of the site and one along the southern site boundary. The balance of the site was improved by parking areas, driveways, outdoor storage yards and landscaping. The northern building appeared to be used for administration, fabrication and shipping and receiving. The southern building appeared to be for fabrication and offices.

The facility manufactures magnesium and some aluminum pieces using extrusion technology. In addition, they do milling, cutting and other fabrication and assembly to complete their parts. They operate several large presses, hydraulic pumps and compressor systems and maintain a number of large indoor and outdoor storage areas.

Mr. Keeling stated that no fabricated parts are coated or cleaned at the site. Acid and caustic baths in the south building are for dye cleaning.

Photographic documentation provided in Appendix A was limited to non-production and outdoor areas of the site. Photographs were not permitted in production areas including press, extrusion, and milling areas of the building.

## 6.2 Specific Site Features

TABLE 6-1 Specific Site Features		
Feature	Observed during site visit	Not observed during site visit
Drinking Water Source	X	
Sewage Disposal/Septic	X	
Use or Storage of Hazardous Substances	X	
Use or Storage of Petroleum Products	X	
Aboveground Storage Tanks	X	
Underground Storage Tanks (or ancillary equipment)		X
Surficial Staining or Corrosion	X	
Stressed Vegetation		X
Drums or Other Containers	X	
Transformers	X	
Drains or Sumps		X
Pits, Ponds or Lagoons	X	
Solid Waste Disposal		X
Wastewater Discharges	X	
Water Supply or Monitoring Wells		X

### 6.2.1 Discussion of Observed Features

#### ***Water and Sewage Disposal***

Drinking water and sewage disposal services are provided to the site by the City of Aurora.

#### ***Use and Storage of Hazardous Substances***

Limited chemical use was noted in the north building. Containers of Met-L-X, a fire suppressant were present throughout the building. The material is not hazardous.

A small solvent stand was present in the main shop area of the north building for equipment maintenance. Mr. Keeling reported that Safety-Kleen maintains the stand.

Mr. Keeling reported that they currently have about 10 gallons of tetrachloroethene (PCE) in the quality control laboratory that they use for sample preparation. He reported that they have about 30 gallons stored pending off-site disposal.

Acid and caustic baths were observed in the south building. Mr. Keeling reported that they are emptied periodically and Clean Harbors manages the wastes. 50-pound bags of soda beads also were present in the area to control pH in the baths.

#### ***Use and Storage of Petroleum Products/ASTs***

Oil reservoirs are present on a number of the presses in buildings throughout the site. A large pump room is present in the western portion of the north building that stores the hydraulic oil to run the extrusion equipment. The oil is contained in an approximately 6,000-gallon AST.

A small AST for new oil is present in the south building to supply the press oil reservoirs. In the same area were drums of gear lube. A propane tank is present in the yard between the two buildings.

***Surface Staining/Corrosion***

Several areas of the south building appeared to have significant staining on the concrete floors. It appeared to be significant as a result of accumulation over many years. However, no floor drains were in the areas and the staining is not considered a REC for the site.

The concrete in the area of the acid and caustic baths showed some corrosion. Because of the nature of the chemical use in that area, it is not considered a REC.

***Drums and Other Containers***

A number of non-hazardous chemicals are used at the site. These included drums of rust inhibitor and an orange biodegradable cleaning solvent.

Numerous empty drums were stored west of the north building in the storage yard.

***Transformers***

A pad-mounted transformer was observed on site along the west side of the north building. It was stamped with the notation "contains no PCB". Additional non-PCB transformers were along the north side of the south building. Such transformers, when present, are typically the property of the local electrical utility, and the costs of investigation and remediation, if any, of a release from these utility-owned transformers are the responsibility of the utility company. No evidence of leakage such as discolored transformers or stained concrete were was observed.

***Pits***

All of the presses in the north building were located within containment pits. Mr. Keeling reported that in the event of releases of hydraulic fluid, the pits would contain the spills. There are not outlets to the pits. The hydraulic lines for the presses also were located within trenches from the pump room to the containment pits.

***Wastewater Discharges***

Mr. Keeling reported that they discharge waste water to the sanitary once it has run through a separator. The City of Aurora permits the discharge.

No features suggesting the presence of RECs for the site were observed.

**6.3 Adjoining Property Observations**

Observations of adjoining properties (from the site's boundaries and public right-of-ways) were made to identify apparent RECs.

The site is adjoined to the north by Smith Road beyond which is a railroad track. The nearest business is about ¼ mile north of the site and is occupied by Frito-Lay. Moline Street adjoins the site to the east, beyond which are two commercial buildings occupied by multiple tenants. The tenants included multiple automotive repair and one brake service businesses. Adjoining the site to the south is a commercial warehouse building occupied by Russell Stover. Beyond an intervening vacant parcel that has been identified as an old landfill is the Denver County Jail. No evidence of storage or use of hazardous substances or petroleum products was observed on the adjoining properties during the site visit. Based upon field observations, the adjoining properties do not appear to be RECs for the site.

## 7.0 SUMMARY OF FINDINGS

**Historical Information Summary:** The site acreage was undeveloped land in the 1940s and 1950s, but appeared to have been filled in the 1960s in preparation for development. The current north building was constructed in 1969 and historical information indicated that the south building was constructed in 1972. From the time of construction until about 1999, the site was occupied by Dow Chemical's Magnesium Extrusion fabrication plant. Since that time, Timminco has owned the business and continued the operation. Historical operations included some solvent use, and a subsurface investigation was conducted in 1999 at the time of the business sale. The investigation results indicated that low concentrations of volatile organic compounds were detected in the site soils and groundwater, but no detected concentrations exceeded any State or Federal action levels. Several metals were detected in soils and groundwater, but all were below action levels or were also detected in the upgradient wells suggesting an off-site source. The results of the subsurface investigation did not suggest RECs for the site.

The adjoining properties to the east and west were vacant range land in the 1940s and 1950s. Landfilling operations occurred on both properties prior to their current use. By the early 1970s, commercial development of the adjoining property to the east had commenced. It continued into the early 1980s and has had a number of tenants since that time. Landfilling continued into the late 1960s or early 1970s on the adjoining property to the west. It was covered and has been undeveloped since that time. The nearest commercial development north of the site began about the same time as the site development and continued to expand through the 1990s. It has been occupied for many years by Frito Lay. The adjoining property to the south was first developed for commercial use by the early 1970s but the historic tenants were not identified in the city directory research. The adjoining historic property uses are not suspected to represent RECs for the site at this time.

**Site Reconnaissance Summary:** The site is improved by two commercial/industrial buildings. Currently, Timminco operates the facility that has been on site since 1969. Timminco has ceased use of much of the solvent that was identified in the 1999 subsurface investigation report. Currently, a limited number of solvents are used at the site for equipment maintenance. One solvent stand is operated and is maintained by Safety Kleen. Hydraulic are used to drive presses. Hydraulic pumps, flow lines, and presses are operated within areas of secondary containment or within closed trench and pit areas to contain any leaks. Acid and caustic baths are present in the south building and are used to clean dyes used in the fabrication operations. Waste acids and caustics as well as used oils are managed by Clean Harbors. Drummed new oil and used oil is stored inside the south building inside a secondary containment. The outdoor storage areas are used to store raw magnesium and aluminum products and miscellaneous items. No hazardous substances or wastes or petroleum products or wastes are stored outside. The current use is not a REC for the site.

**Regulatory Database Summary:** The site was identified as a registered storage tank facility, a Small Quantity Generator (SQG) of hazardous waste and for a spill in 1985. The tank contains propane and is not a REC for the site. The facility was cited in 2002 for a minor infraction related to their hazardous waste management, but they have not



been referred to the corrective actions program. Their status as an SQG is not a REC for the site. The spill report indicated that the spilled chemical was PCBs and estimated the spilled volume at 10 to 20 gallons. The report indicated that the impacted medium was soil. Timminco personnel stated that they had no record of the spill in their files (it occurred before Timminco bought the site), and because of the age of the spill, the State and Federal agencies have no additional records. The available records suggested that it was cleaned up although there is no documentation available. Because of the magnitude and the age of the spill, it is not considered a REC for the site. The site was not identified on any other state or federal regulatory databases searched.

Regulated facilities adjoined the site to the east and west. Both are former landfill areas. The adjoining area to the east in the area cross- to upgradient was identified as demolition fill although some historic testing identified at least limited methane generation. In the event of groundwater contamination at that location, the groundwater beneath the subject site may be impacted. The facility to the west was identified for domestic fill, as well as other types of disposal. An investigation in that area suggested groundwater impacts. However, the facility is on the downgradient side of the site and should not pose a REC for the site. Several other regulated facilities were identified in the area generally upgradient but not adjoining the site. However, they did not appear to represent RECs for the site. The remaining facilities were located in areas cross- to downgradient and are not considered RECs for the site.

## **8.0 CONCLUSIONS AND RECOMMENDATIONS**

No data gaps were identified related to the collection of historical site use information for this assessment. Although search intervals from the 1930s through the 1960s exceeded 5-year intervals, the site use appeared unchanged during the period except that the site may have been filled prior to construction. However, a subsurface investigation at the site did not identify significant soil or groundwater impacts and that potential is not considered a REC for the site. The data gaps are not considered significant to the outcome of this assessment.

Freedom has performed a Phase I Environmental Site Assessment in general accordance with ASTM E1527-05 and the agreed scope of work for the Timminco property at 10380 Smith Road, Aurora, Colorado. This assessment has revealed no evidence of recognized environmental conditions (RECs) for the site.

With regard to the above-listed Findings and Conclusions, Freedom makes no recommendations for additional assessment at this time.

## **9.0 ENVIRONMENTAL PROFESSIONAL DECLARATIONS**

I declare that, to the best of my professional knowledge and belief, all persons involved in the preparation of this assessment meet the definition of Environmental Professional as defined in §312.10 of 40 CFR Part 312. All persons associated with the preparation of this assessment have the specific qualifications based on education, training, and experience to assess a property to the nature, history, and setting of the subject property. Freedom has developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. The qualifications of those persons associated with the preparation of this assessment are included in Appendix E.

The signature on the transmittal page of this report affirms this to be so.

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Personal Communication, 1a, Mr. Scott Churchley, Realtor, December 18, 2006.

Personal Communication, 2a, Mr. Shaun Keeling, Timminco Representative, November 3, 2006.

Personal Communication, 2b, Mr. Shaun Keeling, Timminco Representative, December 6, 2006.

Personal Communication, 3a, Mr. Brian Hlavacek, Tri-County Health Department, November 20, 2006.

Personal Communication, 4a, Aurora Fire Department, November 20, 2006.

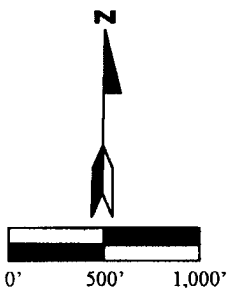
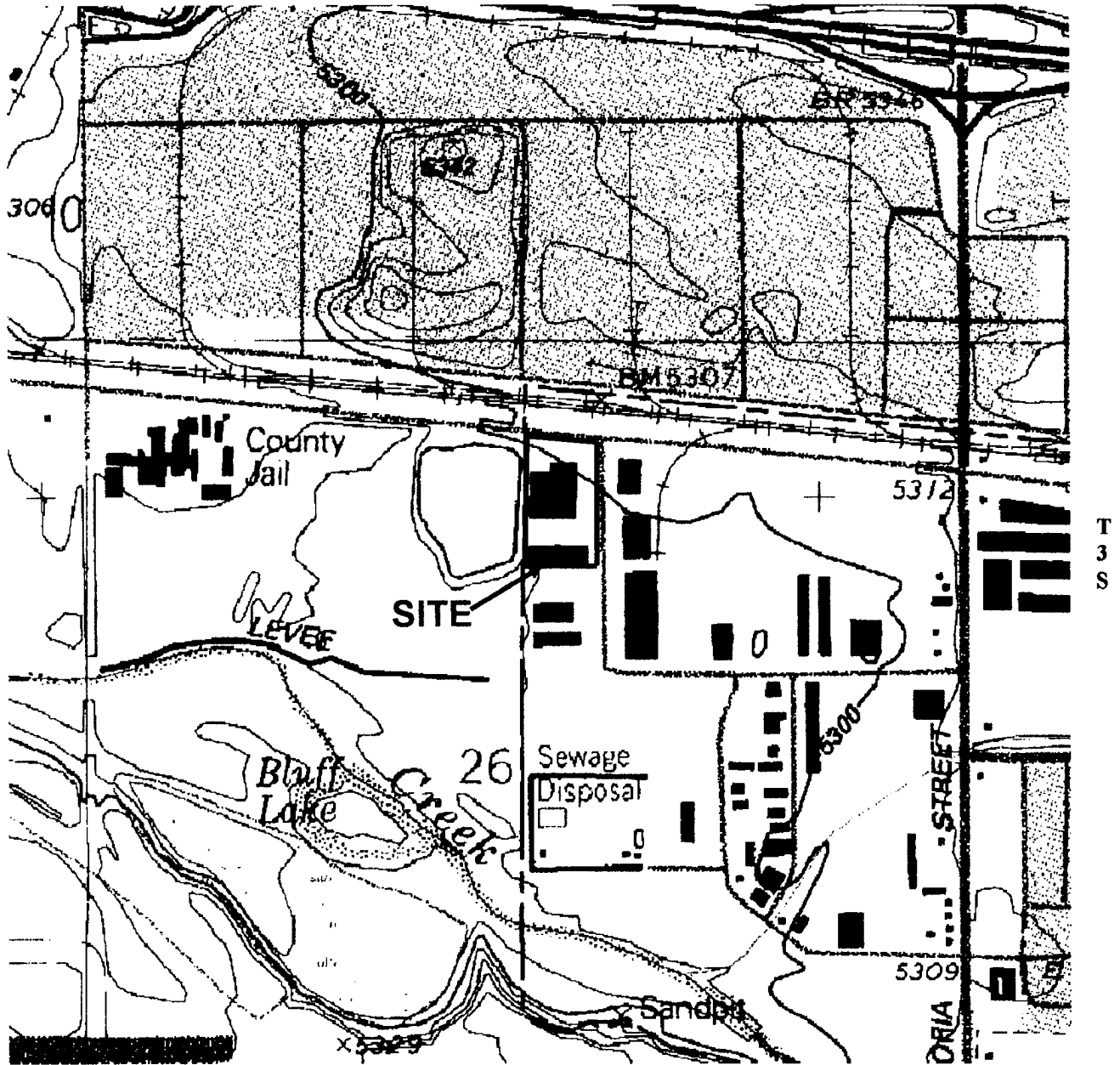
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Satisfi Environmental Information-City Directory Research, November 1, 2006.

URS Greiner Woodward Clyde, Phase II Environmental Investigation, Dow Chemical's Magnesium Extrusion Facility, 10380 Smith Road, January 21, 1999.



R 67 W



SOURCE:  
USGS MAP, MONTBELLO, CO  
QUADRANGLE, 7.5 MINUTE SERIES.  
1965, REVISED 1994.

CONTOUR INTERVAL: 10'

## FIGURE 1 SITE VICINITY MAP

TIMMINCO PROPERTY  
11380 SMITH ROAD  
AURORA, COLORADO  
PROJECT NO. 0606-076

**FREEDOM ENVIRONMENTAL  
CONSULTANTS, INC.**



SCALE UNKNOWN

Source: Google Earth

## FIGURE 2

### SITE PLAN MAP – AERIAL PHOTO

TIMMINCO PROPERTY  
10380 SMITH ROAD  
AURORA, COLORADO  
PROJECT NO. 0606-076

**FREEDOM ENVIRONMENTAL  
CONSULTANTS, INC.**





Photo #1: View southeast toward the main (north) site building.



Photo #2: View southwest of the north building. The parking lot in the foreground is part of the site. The building in the distance at the far left is the south building.





Photo #3: View south in the western portion of the outdoor storage yard. The south building is beyond the yard. The awning at the left is on the southwest portion of the north building.



Photo #4: View southeast toward the covered storage area. The silver rolls are extruded magnesium that is ready for further use.



Photo #5: Raw metal product and scrap metal in the drums.



Photo #6: Shipping and receiving area of the north building.



Photo #7: Oil storage, lube, and sorbant storage in the north building.



Photo #8: Drums of oil, lube, rust inhibitor and other chemicals within secondary containment in the south building. There was significant staining on the concrete floor, but it is not considered a REC



Photo #9: Oil and used oil storage adjoining the press room in the south building.



Photo #10: Drums of chemicals next to the acid and caustic baths. The back wall of the baths are at the left. (No good photos of the actual baths were usable).

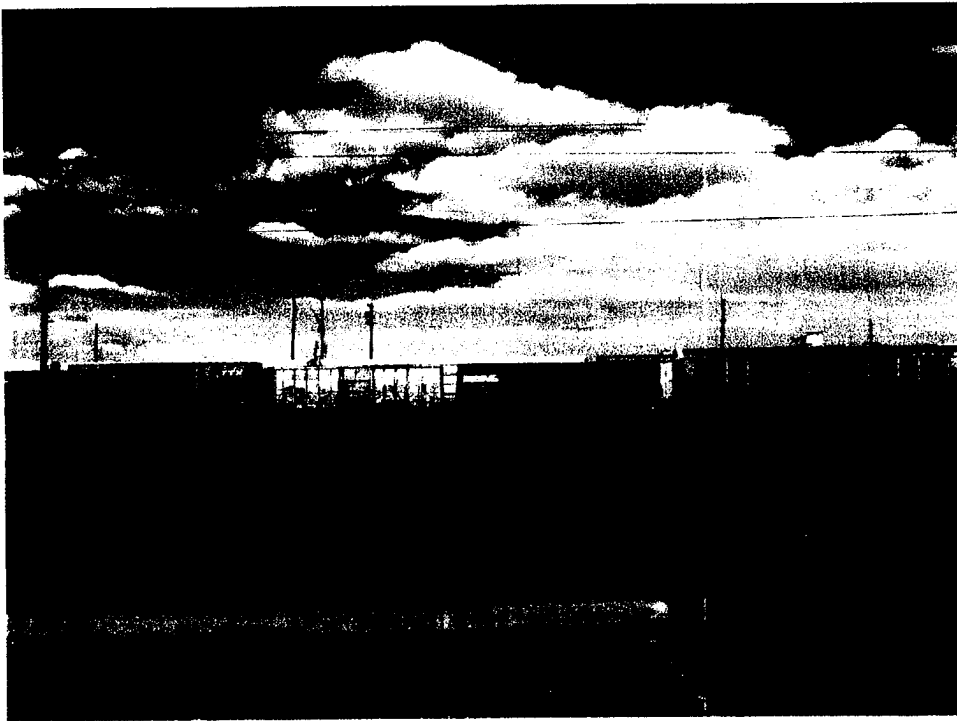


Photo #11: View north of from the northern parking lot. Smith Road is in front of the railroad tracks and commercial buildings are beyond.



Photo #12: View east of the multi-tenant commercial building adjoining the northern portion of the site to the east. Moline Street is beyond the site parking lot.



Photo #13: View northwest of the adjoining commercial building occupied by Russell Stover Candies that is south of the site. The south site building is visible in the distance at the far right.



Photo #14: View west from the north parking lot toward the adjoining properties. Note the sudden change in elevation that identifies the adjoining land as an old landfill. The Denver County Jail is in the distance.